

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC,  
*et al.*,

Plaintiffs,

Case No. 1:23-cv-10766-JSR

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

GIRARD STREET INVESTMENT  
HOLDINGS LLC,

Plaintiff,

Case No. 1:23-cv-10772-JSR

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

GIRARD STREET INVESTMENT  
HOLDINGS LLC,

Plaintiff,

Case No. 1:24-cv-04448-JSR

v.

PDV HOLDING, INC.,

Defendant.

**DECLARATION OF SCOTT C. SOLBERG IN SUPPORT OF  
DEFENDANTS PDV HOLDING, INC. AND PETRÓLEOS DE VENEZUELA, S.A.'S  
MOTION FOR SUMMARY JUDGMENT  
ON COUNTS III AND IV OF THE CONSOLIDATED COMPLAINTS**

I, SCOTT C. SOLBERG, hereby declare pursuant to 28 U.S.C. § 1746 and Local Rule 7.1 as follows:

1. I am a partner at Eimer Stahl LLP and, counsel for Defendant PDV Holding, Inc.
2. Capitalized terms used herein have the same meanings as in the Memorandum of Law in support of PDV Holding, Inc. and Petróleos de Venezuela's Motion for Summary Judgment filed herewith.
3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Humberto Briceño León, dated January 29, 2025.
4. Attached as Exhibit 2 is a true and correct copy of the Supplemental Expert Report of Humberto Briceño León in Response to Supplemental Expert Report of Dr. Francisco Rodríguez and Expert Report of Dr. Hernando Díaz-Candia, dated February 19, 2025.
5. Attached as Exhibit 3 is a true and correct copy of the Expert Report of Professor M. Todd Henderson, dated January 29, 2025.
6. Attached as Exhibit 4 is a true and correct copy of the Supplemental Expert Report of Professor M. Todd Henderson, dated February 19, 2025.
7. Attached as Exhibit 5 is a true and correct copy of the Expert Report of Jack Schwager, dated January 29, 2025.
8. Attached as Exhibit 6 is a true and correct copy of the Supplemental Expert Report of Jack Schwager, dated February 19, 2025.
9. Attached as Exhibit 7 is a true and correct copy of the Expert Report of Francisco Rodríguez, Ph.D., dated December 12, 2024.

10. Attached as Exhibit 8 is a true and correct copy of the Supplemental Expert Report of Francisco Rodríguez, Ph.D., dated December 12, 2024.

11. Attached as Exhibit 9 is a true and correct copy of the Expert Report of Dr. Hernando Díaz-Candia in Opposition to the Report of Humberto Briceño León, dated February 12, 2025.

12. Attached as Exhibit 10 is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Julián Cárdenas as representative of Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A., taken February 26, 2025.

13. Attached as Exhibit 11 is a true and correct copy of excerpts from the transcript of the deposition of Gina R. Coon, taken February 7, 2025.

14. Attached as Exhibit 12 is a true and correct copy of excerpts from the transcript of the deposition of Robert Koenigsberger, taken February 11, 2025.

15. Attached as Exhibit 13 is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Robert Lanava as representative of Girard Street Investment Holdings LLC and G&A Strategic Investments I–VII LLC, taken February 21, 2025.

16. Attached as Exhibit 14 is a true and correct copy of excerpts from the transcript of the deposition of Robert Lanava, taken February 21, 2025.

17. Attached as Exhibit 15 is a true and correct copy of excerpts from the transcript of the deposition of Matthew Maloney, taken February 13, 2025.

18. Attached as Exhibit 16 is a true and correct copy of excerpts from the transcript of the deposition of Horacio Francisco Medina Herrera, taken February 21, 2025.

19. Attached as Exhibit 17 is a true and correct copy of excerpts from the transcript of the deposition of Luisa Palacios, Ph.D., taken February 10, 2025.

20. Attached as Exhibit 18 is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of J. Robert Shoemaker as representative of PDV Holding, Inc., taken February 26, 2025.

21. Attached as Exhibit 19 is a true and correct copy of excerpts from the transcript of the deposition of J. Robert Shoemaker, taken February 27, 2025.

22. Attached as Exhibit 20 is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of James Taylor as representative of Girard Street Investment Holdings LLC and G&A Strategic Investments I–VII LLC, taken February 18, 2025.

23. Attached as Exhibit 21 is a true and correct copy of excerpts from the transcript of the deposition of James Taylor, taken February 19, 2025.

24. Attached as Exhibit 22 is a true and correct copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Fernando J. Vera as representative of PDV Holding, Inc., taken February 20, 2025.

25. Attached as Exhibit 23 is a true and correct copy of excerpts from the transcript of the deposition of Fernando J. Vera, taken February 21, 2025.

26. Attached as Exhibit 24 is a true and correct copy of Plaintiffs G&A Strategic Investments I LLC, et al.’s Responses and Objections to Defendant PDV Holding Inc.’s First Set of Requests for Admissions, served February 24, 2025.

27. Attached as Exhibit 25 is a true and correct copy of Plaintiff Girard Street Investment Holdings LLC’s Responses and Objections to PDV Holding, Inc.’s First Set of Requests for Admissions, served February 24, 2025.

28. Attached as Exhibit 26 is a true and correct copy of Plaintiff Girard Street Investment Holdings LLC's Supplemental Responses and Objections to Defendant PDV Holding, Inc.'s First Set of Interrogatories, served December 17, 2024.

29. Attached as Exhibit 27 is a true and correct copy of Keith Johnson, *How Venezuela Struck It Poor*, Foreign Policy (July 16, 2018), <https://foreignpolicy.com/2018/07/16/how-venezuela-struck-it-poor-oil-energy-chavez/>.

30. Attached as Exhibit 28 is a true and correct copy of Samuel Stebbin, *These 15 countries, as home to largest reserves, control the world's oil*, USA Today (May 22, 2019), <https://www.usatoday.com/story/money/2019/05/22/largest-oil-reserves-in-world-15-countries-that-control-the-worlds-oil/39497945/>.

31. Attached as Exhibit 29 is a true and correct copy of Richard Lapper, *Venezuela and the Rise of Chávez: A Background Discussion Paper*, Council on Foreign Relations (Nov. 22, 2005), <https://www.cfr.org/backgrounder/venezuela-and-rise-chavez-background-discussion-paper>.

32. Attached as Exhibit 30 is a true and correct copy of *Iconic Venezuelan president Hugo Chávez dies*, BBC (Mar. 6, 2013), <https://www.bbc.com/news/world-latin-america-21679053>.

33. Attached as Exhibit 31 is a true and correct copy of Virginia Lopez, *Nicolás Maduro declared Venezuela election winner by thin margin*, The Guardian (Apr. 15, 2013), <https://www.theguardian.com/world/2013/apr/15/nicolas-maduro-wins-venezuela-election>.

34. Attached as Exhibit 32 is a true and correct copy of Press Statement, Robert J. Palladino, Deputy Spokesperson, U.S. State, Swearing in of Venezuela's New National Assembly

President (Jan. 5, 2019), <https://2017-2021-translations.state.gov/2019/01/05/statement-by-robert-palladino-swearin-of-venezuelas-new-national-assembly-president/>.

35. Attached as Exhibit 33 is a true and correct copy of Press Release, John Kirby, Spokesperson of Public Affairs, U.S. State, Seating of the Venezuelan National Assembly (Jan. 5, 2016), <https://2009-2017.state.gov/r/pa/prs/ps/2016/01/250972.htm>.

36. Attached as Exhibit 34 is a true and correct copy of Press Statement, Heather Nauert, Spokesperson, U.S. State, Assumption of Legislative Powers in Venezuela (Aug. 18, 2017), <https://2017-2021.state.gov/assumption-of-legislative-powers-in-venezuela/>.

37. Attached as Exhibit 35 is a true and correct copy of Statement, The White House, Statement from President Donald J. Trump Recognizing Venezuelan National Assembly President Juan Guaido as the Interim President of Venezuela (Jan. 23, 2019), <https://trumpwhitehouse.archives.gov/briefings-statements/statement-president-donald-j-trump-recognizing-venezuelan-national-assembly-president-juan-guaido-interim-president-venezuela/>.

38. Attached as Exhibit 36 is a true and correct copy of Congressional Research Service report IN12354, Venezuela's 2024 Presidential Election (updated Aug. 2, 2024), <https://crsreports.congress.gov/product/pdf/IN/IN12354>.

39. Attached as Exhibit 37 is a true and correct copy of Vivian Sequera & Mayela Armas, *Venezuela sets presidential election for July 28*, Reuters (Mar. 5, 2024), <https://www.reuters.com/world/americas/venezuela-presidential-election-be-held-july-28-electoral-council-2024-03-05/>.

40. Attached as Exhibit 38 is a true and correct copy of Anatoly Kurmanae, Frances Robles & Julie Turkewitz, *Venezuela's Autocrat Is Declared Winner in Tainted Election*, N.Y.

Times (July 28, 2024), <https://www.nytimes.com/2024/07/28/world/americas/venezuela-election-results.html>.

41. Attached as Exhibit 39 is a true and correct copy of Permanent Council of the Organization of American States, Resolution on the Situation in Venezuela, CP/RES. 1261 (2508/24) (Aug. 16, 2024), [https://www.oas.org/en/council/CP/documentation/res\\_decs/](https://www.oas.org/en/council/CP/documentation/res_decs/).

42. Attached as Exhibit 40 is a true and correct copy of European Parliament, Resolution of 19 September 2024 on the Situation in Venezuela, 2024/2810(RSP) (Sept. 19, 2024), [https://www.europarl.europa.eu/doceo/document/TA-10-2024-0013\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-10-2024-0013_EN.html).

43. Attached as Exhibit 41 is a true and correct copy of Statement, Javier Martínez-Acha Vásquez, Foreign Minister of Panama, U.S. Mission to the United Nations, Joint Statement on the Venezuela Elections (Sept. 12, 2024), <https://usun.usmission.gov/joint-statement-on-the-venezuela-elections/>.

44. Attached as Exhibit 42 is a true and correct copy of Statement, The Carter Center, Carter Center Statement on Venezuela Election (July 30, 2024), <https://www.cartercenter.org/news/pr/2024/venezuela-073024.html>.

45. Attached as Exhibit 43 is a true and correct copy of Press Statement, Antony J. Blinken, Former Sec'y of State, U.S. Dep't of State, Assessing the Results of Venezuela's Presidential Election (Aug. 1, 2024), <https://2021-2025.state.gov/assessing-the-results-of-venezuelas-presidential-election/>.

46. Attached as Exhibit 44 is a true and correct copy of Former U.S. Secretary of State Antony J. Blinken (@SecBlinken), X (Nov. 19, 2024, 3:30 PM), <https://x.com/SecBlinken/status/1858971068314382481>.

47. Attached as Exhibit 45 is a true and correct copy of Simon Lewis, *Blinken calls Venezuela's opposition leader Gonzalez 'president-elect'*, Reuters (Nov. 19, 2024), <https://www.reuters.com/world/americas/blinken-calls-venezuelas-opposition-leader-gonzalez-president-elect-2024-11-19/>.

48. Attached as Exhibit 46 is a true and correct copy of Media Note, Office of the Spokesperson, U.S. Dep't of State, *G7 Denounces the Lack of Democratic Legitimacy of Today's Presidential Inauguration in Venezuela* (Jan. 10, 2025), <https://2021-2025.state.gov/office-of-the-spokesperson/releases/2025/01/g7-denounces-the-lack-of-democratic-legitimacy-of-todays-presidential-inauguration-in-venezuela>.

49. Attached as Exhibit 47 is a true and correct copy of Vivian Sequera, Deisy Buitrago & Mayela Armas, *Venezuela's Maduro, opposition each claim presidential victory*, Reuters (July 30, 2024), <https://www.reuters.com/world/americas/venezuelans-vote-highly-charged-election-amid-fraud-worries-2024-07-28/>.

50. Attached as Exhibit 48 is a true and correct copy of Matt Berg & Eric Bazail-Eimil, *Maduro may cry murder to silence Machado*, Politico (Aug. 20, 2024), <https://www.politico.com/newsletters/national-security-daily/2024/08/20/maduro-may-cry-murder-to-silence-machado-00175007>.

51. Attached as Exhibit 49 is a true and correct copy of Vivian Sequera & Mayela Armas, *Venezuela issues arrest warrant for opposition leader Gonzalez, AG says*, Reuters (Sept. 4, 2024), <https://www.reuters.com/world/americas/venezuela-attorney-general-requests-arrest-warrant-opposition-leader-gonzalez-2024-09-02/>.

52. Attached as Exhibit 50 is a true and correct copy of Press Statement, Matthew Miller, Department Spokesperson, U.S. State, *Marking One Month Since Venezuela's Presidential*

Election (Aug. 29, 2024), <https://2021-2025.state.gov/marking-one-month-since-venezuelas-presidential-election/>.

53. Attached as Exhibit 51 is a true and correct copy of a Press Release, Government of Mexico, Second Joint Statement by Brazil, Colombia, and Mexico on the Elections in Venezuela (Aug. 8, 2024), <https://www.gob.mx/sre/prensa/second-joint-statement-by-brazil-colombia-and-mexico-on-the-elections-in-venezuela>.

54. Attached as Exhibit 52 is a true and correct copy of Chase Harrison, Gladys Gerbaud & Khalea Robertson, *How Have International Leaders Responded to Venezuela's 2024 Election?*, Americas Soc'y/Council of the Americas (Aug. 19, 2024), <https://www.as-coa.org/articles/how-have-international-leaders-responded-venezuelas-2024-election>.

55. Attached as Exhibit 53 is a true and correct copy of a Joint Declaration on Venezuela by the President of the Council of Ministers of the Italian Republic, the President of the French Republic, the Chancellor of the Federal Republic of Germany, the President of the Government of Spain, the Prime Minister of the Netherlands, the Prime Minister of the Republic of Poland, and the Prime Minister of the Portuguese Republic (Aug. 3, 2024), <https://www.governo.it/en/articolo/joint-declaration-venezuela/26426>.

56. Attached as Exhibit 54 is a true and correct copy of Federico Rivas Molina & Lorena Arroyo, *Venezuela declares Maduro winner of election, but US and others question the result*, El País (July 29, 2024), <https://english.elpais.com/international/2024-07-29/venezuela-declares-maduro-winner-of-election-but-us-and-others-question-the-result.html>.

57. Attached as Exhibit 55 is a true and correct copy of Media Note, Office of the Spokesperson, U.S. State, Joint Statement on Venezuela Election (Aug. 16, 2024), <https://2021-2025.state.gov/joint-statement-on-venezuela-election/>.

58. Attached as Exhibit 56 is a true and correct copy of *Edison Research Conducts Exit Poll in Venezuela*, Edison Rsch. (July 28, 2024), <https://www.edisonresearch.com/edison-research-conducts-exit-poll-in-venezuela/>.

59. Attached as Exhibit 57 is a true and correct copy of Joshua Goodman, *Venezuelan electoral official asserts “lack of transparency and veracity” in Maduro’s reelection*, The Associated Press (Aug. 26, 2024), <https://apnews.com/article/venezuela-election-maduro-electoral-official-aa924123016cf41d69b8fd84eca0857>.

60. Attached as Exhibit 58 is a true and correct copy of Press Release, U.S. Dep’t of the Treasury, Treasury Sanctions Maduro Regime Officials for Undermining Democratic Order in Venezuela (Sept. 4, 2020), <https://home.treasury.gov/news/press-releases/sm1115>.

61. Attached as Exhibit 59 is a true and correct copy of Press Release, U.S. Dep’t of the Treasury, Treasury Continues Pressure on Illegitimate Regime Officials Undermining Democracy in Venezuela (Sept. 22, 2020), <https://home.treasury.gov/news/press-releases/sm1132>.

62. Attached as Exhibit 60 is a true and correct copy of Press Release, U.S. Dep’t of the Treasury, Treasury Targets Venezuelan Officials Aligned with Nicolas Maduro in Response to Electoral Fraud (Sept. 12, 2024), <https://home.treasury.gov/news/press-releases/jy2577>.

63. Attached as Exhibit 61 is a true and correct copy of Press Statement, Vedant Patel, Principal Deputy Spokesperson, U.S. Dep’t of State, On the ruling of Venezuela’s Supreme Tribunal of Justice (Aug. 23, 2024), <https://2021-2025.state.gov/on-the-ruling-of-venezuela-s-supreme-tribunal-of-justice/>.

64. Attached as Exhibit 62 is a true and correct copy of a certified English translation of Gaceta Oficial de la Republica de Venezuela, No 1.769, *Ley Organica Que Reserva Al Estado*

*La Industria Y El Comercio de Los Hidrocarburos [Organic Law That Reserves to the State(,) the Industry(,) and Trade of Hydrocarbons]* (Aug. 29, 1975).

65. Attached as Exhibit 63 is a true and correct copy of *Venezuela Nationalizes Her Petroleum Industry*, N.Y. Times (Aug. 30, 1975), <https://www.nytimes.com/1975/08/30/archives/venezuela-nationalizes-her-petroleumindustry-venezuela.html>

66. Attached as Exhibit 64 is a true and correct copy of Diana Roy & Amelia Cheatham, *Venezuela: The Rise and Fall of a Petrostate*, Council on Foreign Relations (July 31, 2024, 2:55 PM), <https://www.cfr.org/backgrounder/venezuela-crisis#chapter-title-0-5>.

67. Attached as Exhibit 65 is a true and correct copy of a certified English translation of Asamblea Nacional, *Estatuto que rige la transición a la democracia para restablecer la vigencia de la Constitución de la República Bolivariana de Venezuela [Statute to Govern a Transition to Democracy to Reestablish the Validity of the Constitution of the Republic of Venezuela]* (Feb. 5, 2019).

68. Attached as Exhibit 66 is a true and correct copy of PDV Holding, Inc. Waiver of Notice and Written Consent of the Sole Stockholder in Lieu of a Special Meeting, dated February 15, 2019, designated as Palacios Deposition Exhibit 4, and produced as PDVH\_Girard Street\_000000490.

69. Attached as Exhibit 67 is a true and correct copy of Certificate of Incorporation of PDV Holding, Inc., dated April 21, 1997, and produced as PDVH\_Girard Street\_000007530.

70. Attached as Exhibit 68 is a true and correct copy of PDV Holding, Inc. Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended, dated August 20,

2021, designated as Vera 30(b)(6) Deposition Exhibit 14, and produced as PDVH\_Girard Street\_000007624.

71. Attached as Exhibit 69 is a true and correct copy of the Note Purchase Agreement between Servicios Halliburton de Venezuela, S.A. and Girard Street Investment Holdings LLC dated January 11, 2021, designated as Lanava 30(b)(6) Deposition Exhibit 14, and produced as G\_000070826.

72. Attached as Exhibit 70 is a true and correct copy of the Affidavit of Fernando J. Vera, *Petróleos de Venezuela, S.A. v. PDV Holding, Inc.*, C.A. No. 2023-0778-PAF (Del. Ch. Aug. 25, 2023).

73. Attached as Exhibit 71 is a true and correct copy of the Affidavit of Fernando J. Vera, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151-LPS (D. Del. June 4, 2020), ECF No. 177-1, produced as G\_000006591.

74. Attached as Exhibit 72 is a true and correct copy of the Unanimous Written Consent of the Board of Directors of PDV Holding, Inc. (Feb. 11, 2015), produced as PDVH\_Girard Street\_000000204.

75. Attached as Exhibit 73 is a true and correct copy of correspondence between CITGO personnel and Deutsche Bank personnel, dated January 7, 2015, regarding draft confidential information memorandum, produced as PDVH\_Girard Street\_000091600.

76. Attached as Exhibit 74 is a true and correct copy of correspondence between CITGO personnel, CITGO outside counsel, and Deutsche Bank, dated January 2015, produced as PDVH\_Girard Street\_000053705.

77. Attached as Exhibit 75 is a true and correct copy of the Unanimous Written Consent of the Board of Directors of PDV Holding, Inc., dated October 14, 2014, designated as Vera 30(b)(6) Deposition Exhibit 9, and produced as PDVH\_Girard Street\_000141900.

78. Attached as Exhibit 76 is a true and correct copy of correspondence from Houlihan Lokey Capital Inc. to the Board of Directors of PDV Holding, Inc., dated February 10, 2015, regarding solvency opinion, produced as PDVH\_Girard Street\_000001442.

79. Attached as Exhibit 77 is a true and correct copy of Cordell Eddings & Pietro D. Pitts, *Citgo Said to Plan \$2.5 Billion Debt for Venezuela Dividend*, Bloomberg (Jan. 20, 2015, 1:52 PM), <https://www.bloomberg.com/news/articles/2015-01-20/citgo-said-to-plan-2-5-billion-of-debt-for-dividend-correct->.

80. Attached as Exhibit 78 is a true and correct copy of Action by Unanimous Written Consent of the Board of Directors of PDV Holding, Inc., dated October 25, 2016, produced as PDVH\_Girard Street\_000000367.

81. Attached as Exhibit 79 is a true and correct copy of PDV Holding, Inc. Action by Unanimous Written Consent of the Board of Directors, dated September 15, 2016, designated as Shoemaker 30(b)(6) Deposition Exhibit 22, and produced as PDVH\_Girard Street\_000000364.

82. Attached as Exhibit 80 is a true and correct copy of PDV Holding, Inc. Action by Unanimous Written Consent of the Board of Directors, dated November 30, 2016, designated as Vera 30(b)(6) Deposition Exhibit 11, and produced as PDVH\_Girard Street\_000094719.

83. Attached as Exhibit 81 is a true and correct copy of Press Release, PDV Holding, Inc., PDV Holding, Inc. Recovers CITGO Holding, Inc. Stock Certificate (June 26, 2023), <https://www.pdvhholding.com/News06262023.html>.

84. Attached as Exhibit 82 is a true and correct copy of correspondence from Credit Suisse to PDVSA personnel, dated September 22, 2016, regarding investor feedback on PDVSA, produced as UBS000106.

85. Attached as Exhibit 83 is a true and correct copy of investor feedback on PDVSA from Credit Suisse, dated September 22, 2016, produced as UBS000107.

86. Attached as Exhibit 84 is a true and correct copy of *PdV pledges half of Citgo for Rosneft loan*, Argus Media (Dec. 16, 2023), <https://www.argusmedia.com/en/news-and-insights/latest-market-news/1374742-pdv-pledges-half-of-citgo-for-rosneft-loan>.

87. Attached as Exhibit 85 is a true and correct copy of *Venezuela's PDVSA uses 49.9 pct Citgo stake as loan collateral*, Reuters (Dec. 23, 2016, 4:49 PM), designated as Lanava 30(b)(6) Deposition Exhibit 9.

88. Attached as Exhibit 86 is a true and correct copy of Andres Rojas Jimenez, *Citgo's dividends have been to pay the debt contracted by the last administration*, Petroguia, (last visited May 27, 2024), designated as Palacios Deposition Exhibit 21, and produced as G\_000039253.

89. Attached as Exhibit 87 is a true and correct copy of Executive Order No. 13808, 82 Fed. Reg. 41155 (Aug. 24, 2017), <https://ofac.treasury.gov/media/5476/download?inline>, produced as PDVSA\_0033920.

90. Attached as Exhibit 88 is a true and correct copy of OFAC FAQ No. 513 (July 19, 2018), <https://ofac.treasury.gov/faqs/513>, produced as PDVSA\_0034484.

91. Attached as Exhibit 89 is a true and correct copy of Executive Order No. 13835, 83 Fed. Reg. 24001 (May 21, 2018), <https://ofac.treasury.gov/media/5511/download?inline>, produced as PDVSA\_0034481.

92. Attached as Exhibit 90 is a true and correct copy of Determination Pursuant to Executive Order 13850 of November 1, 2018, as amended, OFAC (Jan. 28, 2019), <https://ofac.treasury.gov/media/34141/download?inline>, produced as G\_000006855.

93. Attached as Exhibit 91 is a true and correct copy of Determination Pursuant to Executive Order 13850 of November 1, 2018, as amended, OFAC (Mar. 22, 2019), <https://ofac.treasury.gov/media/34146/download?inline>.

94. Attached as Exhibit 92 is a true and correct copy of Determination Pursuant to Executive Order 13850 of November 1, 2018, as amended, OFAC (May 9, 2019), <https://ofac.treasury.gov/media/34151/download?inline>.

95. Attached as Exhibit 93 is a true and correct copy of Executive Order No. 13850, 83 Fed. Reg. 55243 (Nov. 1, 2018), <https://ofac.treasury.gov/media/5516/download?inline>.

96. Attached as Exhibit 94 is a true and correct copy of Press Release, U.S. Dep't of the Treasury, Treasury Sanctions Venezuela's State-Owned Oil Company Petroleos de Venezuela, S.A. (Jan. 28, 2019), <https://home.treasury.gov/news/press-releases/sm594>.

97. Attached as Exhibit 95 is a true and correct copy of OFAC FAQ No. 398 (Aug. 11, 2020), <https://ofac.treasury.gov/faqs/398>.

98. Attached as Exhibit 96 is a true and correct copy of Exec. Order No. 13857, 84 Fed. Reg. 509 (Jan. 30, 2019), <https://ofac.treasury.gov/media/5491/download?inline>, produced as PDVSA\_0034447.

99. Attached as Exhibit 97 is a true and correct copy of Order No. 13884, 84 Fed. Reg. 38843 (Aug. 5, 2019), <https://ofac.treasury.gov/media/26786/download?inline>.

100. Attached as Exhibit 98 is a true and correct copy of General License 2A, OFAC (Aug. 5, 2019), <https://ofac.treasury.gov/media/34121/download?inline>, produced as PDVSA\_0041370.

101. Attached as Exhibit 99 is a true and correct copy of 88 Fed. Reg. 1507 (Jan. 11, 2023).

102. Attached as Exhibit 100 is a true and correct copy of General License 7C, OFAC (Aug. 5, 2019), <https://ofac.treasury.gov/media/34136/download?inline>, produced as G\_000319794.

103. Attached as Exhibit 101 is a true and correct copy of 86 Fed. Reg. 58016 (Oct. 20, 2021).

104. Attached as Exhibit 102 is a true and correct copy of OFAC FAQ No. 933 (Oct. 1, 2021), <https://ofac.treasury.gov/faqs/933>.

105. Attached as Exhibit 103 is a true and correct copy of General License 31B, OFAC (Jan. 9, 2023), <https://ofac.treasury.gov/media/930241/download?inline>.

106. Attached as Exhibit 104 is a true and correct copy of License No. VENEZUELA-EO13850-2019-360251-1, OFAC (Apr. 24, 2019).

107. Attached as Exhibit 105 is a true and correct copy of License Extension for License No. VENEZUELA-EO13850-2020-365614-4, OFAC (July 22, 2024), produced as PDVH\_Girard Street\_000031939.

108. Attached as Exhibit 106 is a true and correct copy of License No. VENEZUELA-EO13850-2020-365614-1, OFAC (Mar. 6, 2020).

109. Attached as Exhibit 107 is a true and correct copy of License Extension for License No. VENEZUELA-2017-347358-5, OFAC (June 13, 2023).

110. Attached as Exhibit 108 is a true and correct copy of License No. VENEZUELA-2017-347358-1, OFAC (Oct. 27, 2017).

111. Attached as Exhibit 109 is a true and correct copy of Corporate Services Agreement between CITGO Petroleum Corporation and PDV Holding, Inc., dated January 1, 2002, designated as Vera 30(b)(6) Deposition Exhibit 6, and produced as PDVH\_Girard Street\_000001439.

112. Attached as Exhibit 110 is a true and correct copy of By-Laws of PDV Holding, Inc. (as amended and restated as of March 31, 2022), produced as PDVH\_Girard Street\_000007247.

113. Attached as Exhibit 111 is a true and correct copy of Policy on Board Appointments, PDV Holding, Inc., produced as PDVH\_Girard Street\_000140951.

114. Attached as Exhibit 112 is a true and correct copy of Gaceta Legislativa Publicata (February 20, 2019), designated as Palacios Deposition Exhibit 3, and produced as PDVSA\_0000416.

115. Attached as Exhibit 113 is a true and correct copy of National Assembly Resolution on the Appointment of PDVSA Ad Hoc Board dated February 20, 2019, designated as Cárdenas 30(b)(6) Deposition Exhibit 3, and produced as PDVSA\_0003286.

116. Attached as Exhibit 114 is a true and correct copy of CITGO Holding, Inc. Waiver of Notice and Written Consent of the Sole Stockholder in Lieu of a Special Meeting (Feb. 15, 2019), designated as Vera 30(b)(6) Deposition Exhibit 31, and produced as PDVH\_Girard Street\_000134949.

117. Attached as Exhibit 115 is a true and correct copy of CITGO Holding, Inc. Waiver of Notice and Unanimous Consent of the Board of Directors in Lieu of a Special Meeting dated

February 15, 2019, designated as Palacios Deposition Exhibit 8, and produced as PDVH\_Girard Street\_000134984.

118. Attached as Exhibit 116 is a true and correct copy of Written Consent of the Board of Directors of CITGO Petroleum Corp., dated November 28, 2017, produced as PDVH\_Girard Street\_000037250.

119. Attached as Exhibit 117 is a true and correct copy of Unanimous Written Consent of the Board of Directors of CITGO Petroleum Corp., dated April 27, 2017, produced as PDVH\_Girard Street\_000037249.

120. Attached as Exhibit 118 is a true and correct copy of Unanimous Written Consent of the Board of Directors of CITGO Petroleum Corp., dated October 20, 2017, produced as PDVH\_Girard Street\_000134981.

121. Attached as Exhibit 119 is a true and correct copy of PDV Holding, Inc. Directors' Consent to Action in Lieu of a Special Meeting, dated June 30, 2019, designated as Palacios Deposition Exhibit 16, and produced as PDVH\_Girard Street\_000000569.

122. Attached as Exhibit 120 is a true and correct copy of the PDV Holding Inc. Citgo Aruba Update presentation from the Board of Directors meeting, dated June 29, 2021, produced as PDVH\_Girard Street\_000107659.

123. Attached as Exhibit 121 is a true and correct copy of a letter from the Board of Directors of PDV Holding, Inc. to Luis Pacheco regarding negotiations with RDA and Aruba Project (Spanish and English), designated as Vera Deposition Exhibit 32, and produced as PDVSA\_0000712.

124. Attached as Exhibit 122 is a true and correct copy of PDV Holding, Inc. Directors' Consent to Action in Lieu of a Special Meeting, dated May 2, 2019, designated as Palacios Deposition Exhibit 14, and produced as PDVH\_Girard Street\_000001369.

125. Attached as Exhibit 123 is a true and correct copy of CITGO Holding, Inc. Protocol for Handling Board-level Investigations, dated July 12, 2022, produced as PDVH\_Girard Street\_000140958.

126. Attached as Exhibit 124 is a true and correct copy of PDV Holding, Inc. Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended (April 30, 2021), <https://efile.fara.gov/docs/6956-Registration-Statement-20210430-1.pdf>.

127. Attached as Exhibit 125 is a true and correct copy of PDV Holding, Inc. Short Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended (Aug. 20, 2021), produced as PDVH\_Girard Street\_000007609.

128. Attached as Exhibit 126 is a true and correct copy of PDV Holding, Inc. Short Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended (April 30, 2021), <https://efile.fara.gov/docs/6954-Short-Form-20210430-12.pdf>.

129. Attached as Exhibit 127 is a true and correct copy of PDV Holding, Inc. Amendment to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended (Oct. 18, 2024), <https://efile.fara.gov/docs/6997-Amendment-20241018-6.pdf>.

130. Attached as Exhibit 128 is a true and correct copy of Exhibit A to PDV Holding, Inc. Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended (Aug. 20, 2021), produced as G\_000097883.

131. Attached as Exhibit 129 is a true and correct copy of PDV Holding, Inc. Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1938 (Mar. 30, 2023), designated as Vera 30(b)(6) Deposition Exhibit 16.

132. Attached as Exhibit 130 is a true and correct copy of Corporate Organization Chart as of February 12, 2015, produced as PDVH\_Girard Street\_0000107494.

133. Attached as Exhibit 131 is a true and correct copy of CRLLC Owners Agreement between ExxonMobil and PDV Chalmette, Inc., dated June 12, 2015, produced as PDVH\_Girard Street\_000020767.

134. Attached as Exhibit 132 is a true and correct copy of Agreement for the Sale and Purchase of the Ownership Interests in Chalmette Refining, L.L.C., dated June 17, 2015, designated as Shoemaker 30(b)(6) Deposition Exhibit 13, and produced as PDVH\_Girard Street\_000020490.

135. Attached as Exhibit 133 is a true and correct copy of the PDVSA Organizational Chart as of November 7, 2024, designated as Cárdenas 30(b)(6) Deposition Exhibit 20, and produced as PDVH\_Girard Street\_000107515.

136. Attached as Exhibit 134 is a true and correct copy of *PBF Energy to buy Chalmette refinery from Exxon, PDVSA*, Reuters (June 18, 2015, 3:54 PM), designated as Taylor 30(b)(6) Deposition Exhibit 3.

137. Attached as Exhibit 135 is a true and correct copy of Press Release, ExxonMobil, ExxonMobil Sells Share of Chalmette Refining, LLC in Louisiana (June 18, 2015, 11:46 AM), <https://investor.exxonmobil.com/news-events/press-releases/detail/488/exxonmobil-sells-share-of-chalmette-refining-llc-in>.

138. Attached as Exhibit 136 is a true and correct copy of Certification of Estimated Statement for CRLLC Owners Agreement, dated October 22, 2015, produced as PDVH\_Girard Street\_000020802.

139. Attached as Exhibit 137 is a true and correct copy of Services Agreement among PDV Chalmette, PDVSA, and PPSA, dated October 22, 2015, designated as Shoemaker 30(b)(6) Deposition Exhibit 10, and produced as PDVH\_Girard Street\_000020797.

140. Attached as Exhibit 138 is a true and correct copy of Services Agreement among PDV Chalmette, PDVSA, and PPSA, dated March 9, 2022, designated as Palacios Deposition Exhibit 37, and produced as PDVH\_Girard Street\_000007541.

141. Attached as Exhibit 139 is a true and correct copy of Services Agreement among PDV Chalmette, PDVSA, and PPSA, dated August 30, 2022, produced as PDVH\_Girard Street\_000039004.

142. Attached as Exhibit 140 is a true and correct copy of Services Agreement among PDV Chalmette, PDVSA, and PPSA, dated September 11, 2023, produced as PDVH\_Girard Street\_000007560.

143. Attached as Exhibit 141 is a true and correct copy of Services Agreement among PDV Chalmette, PDVSA, and PPSA, dated July 25, 2024, produced as PDVH\_Girard Street\_000020345.

144. Attached as Exhibit 142 is a true and correct copy of PDV Holding, Inc. Directors' Consent to Action in Lieu of a Special Meeting, dated September 11, 2023, produced as PDVH\_Girard Street\_000001222.

145. Attached as Exhibit 143 is a true and correct copy of PDV Holding, Inc. Minutes of a Special Meeting of the Board of Directors Held on November 5, 2021, produced as PDVH\_Girard Street\_000000972.

146. Attached as Exhibit 144 is a true and correct copy of PDVSA Ad Hoc Services Agreement presentation for the PDV Holding, Inc. Board of Directors meeting, dated June 29, 2021, designated as Vera 30(b)(6) Deposition Exhibit 5, and produced as PDVH\_Girard Street\_000107680.

147. Attached as Exhibit 145 is a true and correct copy of Unanimous Written Consent of the Board of Directors of PDV Holding, Inc., dated January 13, 2016, produced as PDVH\_Girard Street\_000000326.

148. Attached as Exhibit 146 is a true and correct copy of Procurement Services Agreement between LDC Supply International, LLC and PPSA, dated January 13, 2016, designated as Shoemaker Deposition Exhibit 4, and produced as PDVH\_Girard Street\_000087462.

149. Attached as Exhibit 147 is a true and correct copy of Services Agreement among LDC Supply International, LLC, PDVSA, and PPSA, dated October 10, 2019, produced as PDVH\_Girard Street\_000009039.

150. Attached as Exhibit 148 is a true and correct copy of PDV Holding, Inc. Directors' Consent to Action in Lieu of a Special Meeting, dated May 7, 2019, designated as Palacios Deposition Exhibit 23, and produced as PDVH\_Girard Street\_000000551.

151. Attached as Exhibit 149 is a true and correct copy of CITGO Holding Inc. Waiver of Notice and Written Consent of the Sold Shareholder in Lieu of a Special Meeting, dated

February 15, 2019, designated as Vera Deposition Exhibit 31, and produced as PDVH\_Girard Street\_000140998.

152. Attached as Exhibit 150 is a true and correct copy of Consent to Action of LDC Supply International, LLC, dated May 7, 2019, produced as PDVH\_Girard Street\_000008484.

153. Attached as Exhibit 151 is a true and correct copy of PDV Holding, Inc. Minutes of a Special Meeting of the Board of Directors, dated April 21, 2020, designated as Palacios Deposition Exhibit 44, and produced as PDVH\_Girard Street\_000000665.

154. Attached as Exhibit 152 is a true and correct copy of PDV Holding, Inc. Minutes of a Special Meeting of the Board of Directors Held, dated September 16, 2022, produced as PDVH\_Girard Street\_000001087.

155. Attached as Exhibit 153 is a true and correct copy of PDV Holding Inc., Certificate of the Secretary, dated December 7, 2022, produced as PDVH\_Girard Street\_000001097.

156. Attached as Exhibit 154 is a true and correct copy of a letter from the PDVSA Ad Hoc Administrative Board regarding Settlement of Accounts, dated December 8, 2022, produced as PDVH\_Girard Street\_000001105.

157. Attached as Exhibit 155 is a true and correct copy of the Note Agreement among Petróleos de Venezuela, S.A., PDVSA Petróleo, S.A., Servicios Halliburton de Venezuela, S.A., and Servicios Halliburton de Venezuela, S.A., dated June 29, 2016, produced as G\_000067616.

158. Attached as Exhibit 156 is a true and correct copy of the Declaration of Tim McKeon for Halliburton Company in response to a Discovery Subpoena from PDVH, dated February 5, 2025.

159. Attached as Exhibit 157 is a true and correct copy of the Declaration of Julio Carberol Schotborgh for Schlumberger Limited a/k/a Schlumberger N.V. in response to a Discovery Subpoena from PDVH, dated February 12, 2025.

160. Attached as Exhibit 158 is a true and correct copy of the Stipulation of Facts regarding Original Noteholders, dated February 28, 2025.

161. Attached as Exhibit 159 is a true and correct copy of the Assignment and Acceptance between Servicios Halliburton de Venezuela, S.A. and Girard Street Investment Holdings LLC dated January 14, 2021, produced as G\_000036653.

162. Attached as Exhibit 160 is a true and correct copy of the Gramercy Special Situations Overview Presentation dated January 2021, designated as Taylor Deposition Exhibit 2, produced as G\_000283654.

163. Attached as Exhibit 161 is a true and correct copy of the Note Agreement between Petróleos de Venezuela, S.A., PDVSA Petróleo, S.A., and Schlumberger Venezuela, S.A. dated May 4, 2017, designated as Maloney Deposition Exhibit 18, and produced as G\_000037422.

164. Attached as Exhibit 162 is a true and correct copy of Schlumberger N.V. (Schlumberger Limited), Annual Report (Form 10-K) (Jan. 24, 2018).

165. Attached as Exhibit 163 is a true and correct copy of LMA Trade Confirmation (Bank Debt) between Cowen and Company, LLC and G&A Strategic Holdings, LLC, dated October 18, 2018, designated as Maloney Deposition Exhibit 2, and produced as G\_000064895.

166. Attached as Exhibit 164 is a true and correct copy of the Assignment and Acceptance between Cowen and Company, LLC and G&A Strategic Investments I LLC dated October 29, 2018, with exhibits, designated as Lanava 30(b)(6) Deposition Exhibit 13, and produced as G\_000297186.

167. Attached as Exhibit 165 is a true and correct copy of the Gramercy Distressed Opportunity Fund III Advisory Committee Meeting presentation, dated November 30, 2022, produced as G\_000041626.

168. Attached as Exhibit 166 is a true and correct copy of correspondence between Halliburton and Gramercy, dated November 2020, regarding Halliburton Due Diligence, produced as G\_000305479.

169. Attached as Exhibit 167 is a true and correct copy of a Demonstrative Exhibit for the Girard Street Structure Chart, designated as Lanava 30(b)(6) Deposition Exhibit 1, based on documents produced as G\_000305479 (November 25, 2020).

170. Attached as Exhibit 168 is a true and correct copy of Gramercy Funds Management LLC Incumbency Certificate, designated as Lanava 30(b)(6) Deposition Exhibit 15, and produced as G\_000037942.

171. Attached as Exhibit 169 is a true and correct copy of the Authorized Signatory List for Gramercy Funds Management LLC, dated May 2018, produced as G\_000037273.

172. Attached as Exhibit 170 is a true and correct copy of PDVSA Promissory Note Ownership chart as of February 24, 2020, designated as Lanava 30(b)(6) Deposition Exhibit 2, and produced as G\_000308185.

173. Attached as Exhibit 171 is a true and correct copy of correspondence between Gramercy personnel regarding Exit Price PDVSA Promissory Notes, dated October 25, 2021, designated as Maloney Deposition Exhibit 25, and produced as G\_000055066.

174. Attached as Exhibit 172 is a true and correct copy of the Deloitte final report to Gramercy Funds Management, LLC regarding Fair Value of a Promissory Note issued by Petróleos

de Venezuela, S.A., as of September 30, 2019, dated November 21, 2019, designated as Koenigsberger Deposition Exhibit 6, and produced as G\_000049718.

175. Attached as Exhibit 173 is a true and correct copy of correspondence from B. Joannou to S. Seaman, D. Wilson, R. Lanava, and M. Maloney about PDVSA Prom Note L3, designated as Lanava 30(b)(6) Deposition Exhibit 16, and produced as G\_000299373.

176. Attached as Exhibit 174 is a true and correct copy of Excel Work Product regarding PDVSA Promissory Note Valuation, dated July 31, 2019, designated as Lanava 30(b)(6) Deposition Exhibit 17.

177. Attached as Exhibit 175 is a true and correct copy of correspondence from R. Koenigsberger to M. Maloney regarding Report on Bondholder & Creditor Recovery Efforts Against Venezuela/PDVSA, designated as Maloney Deposition Exhibit 19, and produced as G\_000043426.

178. Attached as Exhibit 176 is a true and correct copy of Richard J. Cooper & Boaz S. Morag, *Start Your Engines: Are We Going to See More Creditor Recovery Efforts in Venezuela?* (May 29, 2018), designated as Maloney Deposition Exhibit 20, and produced as G\_000043427.

179. Attached as Exhibit 177 is a true and correct copy of correspondence from R. Koenigsberger to M. Maloney Reuters article titled *Venezuela settles \$1.2B Creditor Claim to Protect CITGO*, designated as Maloney Deposition Exhibit 4, and produced as G\_000146977.

180. Attached as Exhibit 178 is a true and correct copy of Gramercy Distressed Opportunity Fund III - A, L.P. Financial Statements, dated December 31, 2019, designated as Maloney Deposition Exhibit 10, and produced as G\_000051915.

181. Attached as Exhibit 179 is a true and correct copy of correspondence between Gramercy personnel, dated June 26, 2024, regarding Bloomberg article titled *US Court Likely to*

*Extend Period for Reviewing CITGO Bids*, designated as Koenigsberger Deposition Exhibit 25, and produced as G\_000315256.

182. Attached as Exhibit 180 is a true and correct copy of correspondence between J. Taylor and R. Koenigsberger regarding GVOF Call, designated as Koenigsberger Deposition Exhibit 13, and produced as G\_000043777.

183. Attached as Exhibit 181 is a true and correct copy of correspondence between counsel for Plaintiffs Girard Street and G&A and Defendant PDVH, dated February 17, 2025, regarding *Crystallex* diligence request.

184. Attached as Exhibit 182 is a true and correct copy of a certified English translation of the Constitution of the Bolivarian Republic of Venezuela (1999), amended as of February 19, 2009, Extraordinary No. 5.908, art. 303.

185. [Exhibit 183 has been intentionally omitted.]

186. Attached as Exhibit 184 is a true and correct copy of the *OI European Group B.V. v. Bolivarian Republic of Venezuela*, ICSID Case No. ARB/11/25, Award (Mar. 10, 2015).

187. Attached as Exhibit 185 is a true and correct copy of the *Tidewater Inc. v. Bolivarian Republic of Venezuela*, ICSID Case No. ARB/10/5, Award (Mar. 13, 2015).

188. Attached as Exhibit 186 is a true and correct copy of the Complaint, *Crystallex Int'l Corp. v. Petróleos de Venezuela, S.A.*, Case No. 1:15-cv-01082 (D. Del. Nov. 23, 2015), ECF No. 1.

189. Attached as Exhibit 187 is a true and correct copy of the *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, ICSID Case No. ARB(AF)/011/2, Award (Apr. 4, 2016).

190. Attached as Exhibit 188 is a true and correct copy of the Petition to Confirm Arbitral Award, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:16-cv-00661 (D.D.C. Apr. 7, 2016), ECF No. 1.

191. Attached as Exhibit 189 is a true and correct copy of the Order Confirming Arbitral Award, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:16-cv-00661 (D.D.C. Mar. 25, 2017), ECF No. 31.

192. Attached as Exhibit 190 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2017), ECF No. 2.

193. Attached as Exhibit 191 is a true and correct copy of the *Phillips Petroleum Co. Venezuela Ltd. v. Petróleos de Venezuela, S.A.*, ICC Case No. 20549/ASM/JPA, Final Award (Apr. 24, 2018).

194. Attached as Exhibit 192 is a true and correct copy of the Order Granting Issuance of a Writ of Attachment, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 9, 2018), ECF No. 78.

195. Attached as Exhibit 193 is a true and correct copy of the Notice of Appeal by PDVSA, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 10, 2018), ECF No. 80.

196. Attached as Exhibit 194 is a true and correct copy of the Order Directing Clerk to Issue Praeclipe and Writ, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 23, 2018), ECF No. 95.

197. Attached as Exhibit 195 is a true and correct copy of the Clerk Process Receipt and Return of Writ, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 27, 2018), ECF No. 96.

198. Attached as Exhibit 196 is a true and correct copy of the Motion for Summary Judgment in Lieu of Complaint, *Red Tree Investments, LLC v. Petróleos de Venezuela, S.A.*, Case

No. 651005/2019, NYSCEF Doc. No. 11 (Sup. Ct. N.Y. Cnty. Feb. 15, 2019) (before removal to S.D.N.Y.).

199. Attached as Exhibit 197 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *OI European Group B.V. v. Bolivarian Republic of Venezuela*, Case No. 1:19-mc-00290 (D. Del. Nov. 4, 2019), ECF No. 2.

200. Attached as Exhibit 198 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Tidewater Inv. SRL v. Bolivarian Republic of Venezuela*, Case No. 1:19-mc-00079 (D. Del. Nov. 15, 2019), ECF No. 5.

201. Attached as Exhibit 199 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Phillips Petroleum Company v. Venezuela Ltd. v. Petróleos de Venezuela, S.A.*, Case No. 1:19-mc-00342 (D. Del. Nov. 26, 2019), ECF No. 2.

202. Attached as Exhibit 200 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Northrop Grumman Ship Syst., Inc. v. Ministry of Defense of the Republic of Venezuela*, Case No. 1:20-mc-00257 (D. Del. Sept. 15, 2020), ECF No. 3.

203. Attached as Exhibit 201 is a true and correct copy of the Opinion Regarding Pending Motions, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Jan. 14, 2021), ECF No. 234.

204. Attached as Exhibit 202 is a true and correct copy of the Order Regarding Pending Motions, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Jan. 14, 2021), ECF No. 235.

205. Attached as Exhibit 203 is a true and correct copy of the Order Appointing Robert B. Pincus as Special Master, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Apr. 13, 2021), ECF No. 258.

206. Attached as Exhibit 204 is a true and correct copy of the Order Regarding Special Master, *Crystalllex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. May 27, 2021), ECF No. 277.

207. Attached as Exhibit 205 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *ACL 1 Investments Ltd. v. Bolivarian Republic of Venezuela*, Case No. 1:21-mc-00046 (D. Del. Nov. 22, 2021), ECF No. 2.

208. Attached as Exhibit 206 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Red Tree Investments LLC v. Petróleos de Venezuela, S.A.*, Case No. 1:22-mc-00068 (D. Del. Feb. 8, 2022), ECF No. 2.

209. Attached as Exhibit 207 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Red Tree Investments LLC v. Petróleos de Venezuela, S.A.*, Case No. 1:22-mc-00069 (D. Del. Feb. 8, 2022), ECF No. 2.

210. Attached as Exhibit 208 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Rusoro Mining Ltd. v. Bolivarian Republic of Venezuela*, Case No. 1:21-mc-00481 (D. Del. Feb. 9, 2022), ECF No. 2.

211. Attached as Exhibit 209 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *ConocoPhillips Gulf of Paria B.V. v. Petróleos de Venezuela, S.A.*, Case No. 1:22-mc-00264 (D. Del. June 15, 2022), ECF No. 2.

212. Attached as Exhibit 210 is a true and correct copy of the Joint Status Report with Updated Proposed Sale Procedures Order, *Crystalllex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 4, 2022), ECF No. 480.

213. Attached as Exhibit 211 is a true and correct copy of the Sixth Revised Sale Procedures Order, *Crystalllex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 11, 2022), ECF No. 481.

214. Attached as Exhibit 212 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Gold Reserve Inc. v. Bolivarian Republic of Venezuela*, Case No. 1:22-mc-00453 (D. Del. Oct. 20, 2022), ECF No. 2.

215. Attached as Exhibit 213 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Dresser-Rand Co. v. Petróleos de Venezuela, S.A.*, Case No. 1:22-mc-00347 (D. Del. Oct. 31, 2022), ECF No. 2.

216. Attached as Exhibit 214 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Contrarian Capital Mgmt., LLC v. Bolivarian Republic of Venezuela*, Case No. 1:21-mc-00018 (D. Del. Apr. 26, 2023), ECF No. 3.

217. Attached as Exhibit 215 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Contrarian Capital Mgmt., LLC v. Bolivarian Republic of Venezuela*, Case No. 1:21-mc-00131 (D. Del. Apr. 26, 2023), ECF No. 3.

218. Attached as Exhibit 216 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Contrarian Capital Mgmt., LLC v. Bolivarian Republic of Venezuela*, Case No. 1:21-mc-00263, (D. Del. Apr. 26, 2023), ECF No. 3.

219. Attached as Exhibit 217 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Valores Mundiales, S.L. v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00298 (D. Del. June 29, 2023), ECF No. 8.

220. Attached as Exhibit 218 is a true and correct copy of the Letter from PDVSA to Judge Stark, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151-LPS (D. Del. July 20, 2023), ECF No. 645.

221. Attached as Exhibit 219 is a true and correct copy of the Order Regarding Sale Process Steps and Priority, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. July 27, 2023), ECF No. 646.

222. Attached as Exhibit 220 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *ConocoPhillips Petrozuata B.V. v. Bolivarian Republic of Venezuela*, Case No. 1:22-mc-00464 (D. Del. Aug. 1, 2023), ECF No. 2.

223. Attached as Exhibit 221 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Lovati v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00340 (D. Del. Aug. 2, 2023), ECF No. 2.

224. Attached as Exhibit 222 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Pharo Gaia Fund, Ltd. v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00360 (D. Del. Aug. 2, 2023), ECF No. 3.

225. Attached as Exhibit 223 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Pharo Gaia Fund, Ltd. v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00361 (D. Del. Aug. 2, 2023), ECF No. 3.

226. Attached as Exhibit 224 is a true and correct copy of the Special Master's Recommendation Letter Regarding Proposed Attached Judgment Procedures, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 7, 2023), ECF No. 652.

227. Attached as Exhibit 225 is a true and correct copy of the Order Adopting Attached Judgment Procedures, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 8, 2023), ECF No. 654.

228. Attached as Exhibit 226 is a true and correct copy of the OI European Group B.V. Additional Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 657.

229. Attached as Exhibit 227 is a true and correct copy of the Girard Street Investment Holdings LLC Attached Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 672.

230. Attached as Exhibit 228 is a true and correct copy of the G&A Strategic Investments Attached Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 675.

231. Attached as Exhibit 229 is a true and correct copy of the Siemens Energy, Inc. Attached Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 673.

232. Attached as Exhibit 230 is a true and correct copy of the Crystalex Attached Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 680.

233. Attached as Exhibit 231 is a true and correct copy of the Tidewater Investment SRL and Tidewater Caribe S.A. Attached Judgment Statement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Aug. 14, 2023), ECF No. 684.

234. Attached as Exhibit 232 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Tenaris S.A. v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00378 (D. Del. Aug. 17, 2023), ECF No. 2.

235. Attached as Exhibit 232(a) is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Tenaris S.A. v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00379 (D. Del. Aug. 17, 2023), ECF No. 2.

236. Attached as Exhibit 233 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Saint-Gobain Performance Plastics Europe v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00397 (D. Del. Sept. 5, 2023), ECF No. 2.

237. Attached as Exhibit 234 is a true and correct copy of the G&A Strategic Investments Summary of Completed Steps – Step 1, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 16, 2023), ECF No. 759.

238. Attached as Exhibit 235 is a true and correct copy of Girard Street Investment Holdings LLC Summary of Completed Steps – Step 1, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 16, 2023), ECF No. 760.

239. Attached as Exhibit 236 is a true and correct copy of the Special Master Status Report Regarding Marketing Process Deadlines, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 23, 2023), ECF No. 771.

240. Attached as Exhibit 237 is a true and correct copy of the Letter from the Special Master to Judge Stark, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151-LPS (D. Del. Dec. 20, 2023), ECF No. 810.

241. Attached as Exhibit 238 is a true and correct copy of the Motion for Writ of Attachment Fieri Facias, *Altana Credit Opportunities Fund SPC v. Bolivarian Republic of Venezuela*, Case No. 1:23-mc-00608 (D. Del. Dec. 21, 2023), ECF No. 3.

242. Attached as Exhibit 239 is a true and correct copy of the Special Master's Status Report Regarding Marketing Process Deadlines, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Jan. 8, 2024), ECF No. 839.

243. Attached as Exhibit 240 is a true and correct copy of the Gramercy and Lovati Motion for Equal Priority Status, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Jan. 26, 2024), ECF No. 893.

244. Attached as Exhibit 241 is a true and correct copy of Memorandum Order, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151, 2024 WL 325133 (D. Del. Jan. 29, 2024), ECF No. 902.

245. Attached as Exhibit 242 is a true and correct copy of the Memorandum Order Denying Gramercy and Lovati Motion for Equal Priority Status, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Feb. 15, 2024), ECF No. 963.

246. Attached as Exhibit 243 is a true and correct copy of the Girard Street Investment Holding LLC's Summary of Completed Steps – Step 2, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Mar. 8, 2024), ECF No. 1038.

247. Attached as Exhibit 244 is a true and correct copy of the G&A Strategic Investments' Summary of Completed Steps – Step 2, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Mar. 8, 2024), ECF No. 1039.

248. Attached as Exhibit 245 is a true and correct copy of the Final Priority Order, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Apr. 3, 2024), ECF No. 1102.

249. Attached as Exhibit 246 is a true and correct copy of the Memorandum Order Regarding Special Master's Motion Seeking Final Determination of the Attached Judgments, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Apr. 25, 2024), ECF No. 1136.

250. Attached as Exhibit 247 is a true and correct copy of Exhibit A to Special Master's Final Determination of Attached Judgments, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Apr. 25, 2024), ECF No. 1140-1.

251. Attached as Exhibit 248 is a true and correct copy of the G&A Strategic Investments Original Petition, *G&A Strategic Inv. I LLC, et al. v. PDV Holding, Inc.*, Cause No. 2024-36664, Env. No. 88636033 (Harris Cty. Tx. June 10, 2024).

252. Attached as Exhibit 249 is a true and correct copy of the Special Master's Motion Requesting Adjournment of the July 15, 2024 Tentative Sale Hearing, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. June 28, 2024), ECF No. 1201.

253. Attached as Exhibit 250 is a true and correct copy of the Special Master's Memorandum in Support of Motion to Enjoin, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Sept. 9, 2024), ECF No. 1249.

254. Attached as Exhibit 251 is a true and correct copy of the Declaration of Raymond B. Strong III in Support of Special Master's Motion to Enjoin, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Sept. 9, 2024), ECF No. 1250.

255. Attached as Exhibit 252 is a true and correct copy of the Special Master's Motion to Expedite Consideration of Motion to Enjoin, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Sept. 9, 2024), ECF No. 1251.

256. Attached as Exhibit 253 is a true and correct copy of the Notice of Special Master's Recommendation Regarding Proposed Purchase Agreement, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Sept. 27, 2024), ECF No. 1325.

257. Attached as Exhibit 254 is a true and correct copy of the Special Master's Joint Status Report, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 18, 2024), ECF No. 1373.

258. Attached as Exhibit 255 is a true and correct copy of the Crystalex Position Statement to Joint Status Report, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 18, 2024), ECF No. 1373-2.

259. Attached as Exhibit 256 is a true and correct copy of the Gold Reserve, Rusoro, Tidewater, Red Tree, Contrarian, and Valores Mundiales Position Statement to Joint Status Report, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 18, 2024), ECF No. 1373-5.

260. Attached as Exhibit 257 is a true and correct copy of the Huntington Ingalls Position Statement to Joint Status Report, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Oct. 18, 2024), ECF No. 1373-7.

261. Attached as Exhibit 258 is a true and correct copy of the Special Master's Status Report Regarding Amber Energy Inc. Alternative Transaction Proposal, *Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 6, 2024), ECF No. 1414.

262. Attached as Exhibit 259 is a true and correct copy of Exhibit A to the Special Master's Status Report Regarding Amber Energy Inc. Alternative Transaction Proposal, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 6, 2024), ECF No. 1414-1.

263. Attached as Exhibit 260 is a true and correct copy of the Special Master's Reply in Support of Revised Injunction Motion, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 6, 2024), ECF No. 1415.

264. Attached as Exhibit 261 is a true and correct copy of the Venezuela Parties' Response to Special Master's Status Report Regarding Amber Energy Inc. Alternative Transaction Proposal, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 8, 2024), ECF No. 1418.

265. Attached as Exhibit 262 is a true and correct copy of the Notice of Unredacted Stock Purchase Agreement (dated Sept. 27, 2024), *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 26, 2024), ECF No. 1446.

266. Attached as Exhibit 263 is a true and correct copy of Exhibit A to the Notice of Unredacted Stock Purchase Agreement (dated Sept. 27, 2024), *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Nov. 26, 2024), ECF No. 1446-1.

267. Attached as Exhibit 264 is a true and correct copy of the Order Denying Motion to Enjoin and Setting Questions for Dec. 13 Status Conference, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Dec. 11, 2024), ECF No. 1493.

268. Attached as Exhibit 265 is a true and correct copy of the Opinion Denying Special Master's Motion to Enjoying the Alter Ego Claimants, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Dec. 30, 2024), ECF No. 1515.

269. Attached as Exhibit 266 is a true and correct copy of the Memorandum Order Regarding Sale Process and Litigation, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Dec. 31, 2024), ECF No. 1517.

270. Attached as Exhibit 267 is a true and correct copy of the Special Master's Notice of Filing of Long-Form Stock Purchase Agreement, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Feb. 10, 2025), ECF No. 1557.

271. Attached as Exhibit 268 is a true and correct copy of Exhibit A to Special Master's Notice of Filing of Long-Form Stock Purchase Agreement, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Feb. 10, 2025), ECF No. 1557-1.

272. Attached as Exhibit 269 is a true and correct copy of the Oral Order Extending Deadline for Notice of Stalking Horse Bid, *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, Case No. 1:17-mc-00151 (D. Del. Mar. 17, 2025), ECF No. 1591.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of March, 2025



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Scott C. Solberg